

Mr. Jim Shafer
c/o Emtec Composites Industries, Inc.
110 Windsor Avenue
Elkhart, IN 46514

Re: 039-15618
Second Administrative Amendment to
FESOP 039-12276-00531

Dear Mr. Shafer:

Emtec Composites Industries, Inc. was issued a FESOP on August 21, 2000, for the operation of a stationary gel coat application and fiberglass parts finishing facility. A letter requesting changes in descriptive information was received on May 9, 2002. According to 326 IAC 2-8-10(a)(6), an administrative amendment can be used for a change that "revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". Therefore, pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows:

(1) The description in Section A.2 is amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) resin casting mold with a maximum capacity of twenty-five (25) pounds per hour of fiberglass products, exhausting at one stack, identified as 1;
- (b) One (1) gel coat spray area with a maximum capacity of five (5) pounds per hour of gel coat, identified as B1, with one (1) high-volume, low pressure (HVLP) spray applicators, utilizing flowcoater application equipment, equipped with dry filters, exhausting through one (1) stack identified as 1;
- (c) One (1) resin/fiberglass chop spray area with a maximum capacity of twenty-five (25) pounds per hour of fiberglass products, utilizing flowcoater application equipment;
- (d) One (1) grinding area with a maximum capacity of thirty (30) pounds per hour, exhausting **inside to the outside of** the building.

(2) The facility description in Section D.1 is amended as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) resin casting mold with a maximum capacity of twenty-five (25) pounds per hour of fiberglass products, exhausting at one stack, identified as 1;

- (b) One (1) gel coat spray area with a maximum capacity of five (5) pounds per hour of gel coat, identified as B1, with one (1) high-volume, low pressure (HVLP) spray applicators, utilizing flowcoater application equipment, equipped with dry filters, exhausting through one (1) stack identified as 1;
- (c) One (1) resin/fiberglass chop spray area with a maximum capacity of twenty-five (25) pounds per hour of fiberglass products, utilizing flowcoater application equipment;
- (d) One (1) grinding area with a maximum capacity of thirty (30) pounds per hour, exhausting ~~inside~~ **to the outside of** the building.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

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cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Emtec Composites Inc.
110 Windsor Avenue
Elkhart, Indiana 46514**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F039-12276-00531	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 21, 2000 Expiration Date: August 21, 2005

First Administrative Amendment No. 039-14895

Issuance Date: September 28, 2001

Second Administrative Amendment: 039-15618		Pages Affected: 4, 25
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:	

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary application of gel coat with resin fill and finishing of fiberglass parts.

Authorized individual:	Michael Gentzhorn
Source Address:	110 Windsor Avenue, Elkhart, Indiana 46514
Mailing Address:	110 Windsor Avenue, Elkhart, Indiana 46514
Phone Number:	(219) 206-0077
SIC Code:	3088
Source Location Status:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) resin casting mold with a maximum capacity of twenty-five (25) pounds per hour of fiberglass products, exhausting at one stack, identified as 1;
- (b) One (1) gel coat spray area with a maximum capacity of five (5) pounds per hour of gel coat, identified as B1, with one (1) high-volume, low pressure (HVLP) spray applicators, utilizing flowcoater application equipment, equipped with dry filters, exhausting through one (1) stack identified as 1;
- (c) One (1) resin/fiberglass chop spray area with a maximum capacity of twenty-five (25) pounds per hour of fiberglass products, utilizing flowcoater application equipment;
- (d) One (1) grinding area with a maximum capacity of thirty (30) pounds per hour, exhausting to the outside of the building.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Two (2) open flamed forced air unit, each with a maximum heating capacity of 0.2

MMBtu/hr, and exhausting to the atmosphere.

- (b) One (1) air make up unit, with a maximum heating capacity of 0.3 MMBtu/hr, and

Emtec Composites Industries, Inc.
Elkhart, Indiana
Permit Reviewer: Spahi

2nd Administrative Amendment No. 039-15618
Amended By: Madhurima D. Moulik

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SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) resin casting mold with a maximum capacity of twenty-five (25) pounds per hour of fiberglass products, exhausting at one stack, identified as 1;
- (b) One (1) gel coat spray area with a maximum capacity of five (5) pounds per hour of gel coat, identified as B1, with one (1) high-volume, low pressure (HVLP) spray applicators, utilizing flowcoater application equipment, equipped with dry filters, exhausting through one (1) stack identified as 1;
- (c) One (1) resin/fiberglass chop spray area with a maximum capacity of twenty-five (25) pounds per hour of fiberglass products, utilizing flowcoater application equipment;
- (d) One (1) grinding area with a maximum capacity of thirty (30) pounds per hour, exhausting to the outside of the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities):

- (a) Use of gel coats, resins, cleanup solvents, and other material containing VOC shall be limited such that the potential to emit (PTE) VOC shall be less than twenty-five (25) tons per twelve (12) consecutive months. Therefore, the requirements of 326 IAC 8-1-6 do not apply. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded.
 - (2) VOC emissions from each type of emitting material shall be calculated as follows:
 - (A) Resin casting: multiply the usage of each resin by the monomer content of each resin and by the emission factor for marble/resin casting taken from EPA's AP-42 document. Any VOC contained in the resin that is not monomer is assumed to be 100% emitted.
 - (B) Gel coats: multiply the usage of each gel coat by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat, and summing the

emissions for all gel coats. Any VOC contained in the gel coat that is not monomer is assumed to be 100% emitted.

Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form,